

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

ADAM PEZEN, Individually and on Behalf of  
All Others Similarly Situated,

CASE NO. 1:15-CV-03484

CLASS ACTION

Plaintiff,

vs.

FACEBOOK, INC.,

Defendant.

\_\_\_\_\_  
CARLO LICATA, Individually and on Behalf  
of All Others Similarly Situated,

CASE NO. 1:15-CV-04022

CLASS ACTION

Plaintiff,

vs.

FACEBOOK, INC.,

Defendant.

\_\_\_\_\_  
NIMESH PATEL, Individually and on Behalf  
of All Others Similarly Situated,

CASE NO. 1:15-CV-04265

CLASS ACTION

Plaintiff,

vs.

FACEBOOK, INC.,

Defendant.

\_\_\_\_\_  
**DECLARATION OF JAY EDELSON IN SUPPORT OF PLAINTIFFS' JOINT  
MOTION FOR APPOINTMENT OF INTERIM CO-LEAD CLASS COUNSEL**

Pursuant to 28 U.S.C. § 1746, I hereby declare and state as follows:

1. I am over the age of eighteen and am fully competent to make this declaration.

2. This declaration is based upon my personal knowledge, except where expressly noted otherwise. If called upon to testify to the matters stated herein, I could and would competently do so.

3. I am an attorney and the founding and managing partner of Edelson PC, which has been retained to represent Plaintiff Licata in this matter.

***Edelson PC's In-House Team of Investigators and Their Role in These Actions.***

4. As described further in the attached firm resume, Edelson PC has been recognized as a leader in plaintiffs' class and mass actions, with a particular emphasis on consumer, privacy, and technology class actions.

5. Through our team of lawyers and computer forensics experts, we have repeatedly demonstrated the dedication and resources that have led courts and commentators to recognize the firm for its "game-changing privacy work" and its "'uncanny ability' to come up with 'creative arguments'" and obtain "momentum-shifting rulings."

6. With respect to the instant cases, prior to filing the *Licata* action, my firm's in-house investigative team of computer forensic experts and attorneys conducted a nine-month investigation into Facebook's alleged conduct. That investigation included analyzing Facebook's deep face technology research, capturing network traffic from a test computer showing details of Facebook's use of facial recognition software, and analyzing Facebook's implementation of, and changes to, its "tag suggest" feature over time.

7. Edelson PC's team of in-house investigators will remain actively involved in the litigation going forward. Specifically, the team will be instrumental in the gathering of

information through formal discovery and other sources, and ultimately, analyzing that information in the context of Plaintiffs' and the putative class's claims, and Facebook's asserted defenses.

***Attachments***

8. Attached as Exhibit A hereto is a true and accurate copy of the Firm Resume of Edelson PC.

9. Attached as Exhibit B hereto is a true and accurate copy of the Firm Resume of Labaton Sucharow LLP.

10. Attached as Exhibit C hereto is a true and accurate copy of the Firm Resume of Robins Geller Rudman & Dowd LLP.

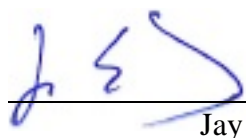
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 11, 2015 in Chicago, Illinois.

  
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Jay Edelson